

Alli Stillman
 Direct Dial: +1.212.906.1747
 alli.stillman@lw.com

1271 Avenue of the Americas
 New York, New York 10020-1401
 Tel: +1.212.906.1200 Fax: +1.212.751.4864
 www.lw.com

LATHAM & WATKINS LLP

June 25, 2024

VIA ECF

Honorable Jennifer L. Rochon
 United States District Court
 Daniel Patrick Moynihan United States Courthouse
 500 Pearl Street
 New York, NY 10007

FIRM / AFFILIATE OFFICES

Austin	Milan
Beijing	Munich
Boston	New York
Brussels	Orange County
Century City	Paris
Chicago	Riyadh
Dubai	San Diego
Düsseldorf	San Francisco
Frankfurt	Seoul
Hamburg	Silicon Valley
Hong Kong	Singapore
Houston	Tel Aviv
London	Tokyo
Los Angeles	Washington, D.C.
Madrid	

Re: Cengage Learning, Inc. et al. v. Google LLC, No. 1:24-cv-04274-JLR-BCM

Dear Judge Rochon:

We represent Defendant Google LLC (“Google”) in the above-captioned matter. Plaintiffs Cengage Learning, Inc.; Bedford, Freeman & Worth Publishing Group, LLC d/b/a Macmillan Learning; Macmillan Holdings, LLC; Elsevier Inc.; Elsevier B.V.; and McGraw Hill LLC (collectively “Plaintiffs”) filed the complaint (“Complaint”) in the above-captioned action on June 5, 2024. Dkt. No. 1. Plaintiffs served Google on June 6, 2024. Dkt. No. 13.

Google’s current deadline to move, answer, or otherwise respond to the Complaint is June 27, 2024. If Google moves to dismiss the Complaint, Plaintiffs must file any opposition by July 11, 2024, with Google’s reply due by July 18, 2024.

Google seeks an extension of time to respond to the Complaint; Plaintiffs consent to that extension and also request an extension of time to oppose any motion to dismiss. Subject to the Court’s approval, the parties have agreed on the following briefing schedule:

1. Google shall move, answer, or otherwise respond to the Complaint by August 26, 2024;
2. If Google moves to dismiss the Complaint, Plaintiffs must file any opposition by September 25, 2024; and
3. Google shall file a reply to any opposition made by Plaintiffs by October 9, 2024.

This is the first request for extension of time in this matter. We thank the Court for its consideration of this request.

LATHAM & WATKINS LLP

Sincerely,

/s/ Allison L. Stillman
Allison L. Stillman
of LATHAM & WATKINS LLP

cc: All Counsel of Record (via ECF)

The requests are GRANTED. Defendant shall respond to the Complaint by August 26, 2024. Plaintiffs shall file any opposition to a motion to dismiss by September 25, 2024. Defendant shall reply to any such opposition by October 9, 2024.

SO ORDERED.

Dated: June 26, 2024
New York, New York


JENNIEER L. ROCHON
United States District Judge